

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:

PURDUE PHARMA L.P., *et al.*,¹

Debtors.

Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

Hearing Date: August 12, 2021, at 10:00
a.m., Eastern Standard Time

**PROPOSED STIPULATIONS BETWEEN CERTAIN DISTRIBUTORS',
MANUFACTURERS', AND PHARMACIES' AND THE DEBTORS REGARDING
DOCUMENTARY EVIDENCE PERTAINING TO THE CONFIRMATION HEARING**

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's registration number are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnic Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

The undersigned parties hereby stipulate and agree as follows:

1. *Scope of Stipulations* The stipulations, including the appendices attached hereto, agreed to by and between the DMPs and the Debtors, including the appendices attached hereto, are applicable for purposes of the confirmation proceedings in these Chapter 11 Cases and any appeals relating thereto, but will not control with respect to any other litigation or proceeding by and between any DMP and any Debtor whether in these Chapter 11 Cases or otherwise.
2. The parties stipulate and agree that the contracts identified on Appendix A exist and any indemnification provisions and/or insurance provisions within such contracts exist as represented on Appendix A.
3. To the extent and during the periods for which Purdue expressly agreed in any contract identified on Appendix A to name a contract counterparty as an additional insured or loss payee in certain insurance policies, the applicable insurance policies issued to Purdue (including without limitation blanket additional insured endorsements) generally included provisions which were intended to permit Purdue to comply with those contractual requirements and to provide the applicable contract counterparty with such coverage.
4. Pursuant to the Plan, the Co-Defendant Claims are Disputed. The parties stipulate and agree that any Proofs of Claim identified on Appendix B evidence claims timely asserted by the Co-Defendants.
5. Each party reserves the right to designate for the record in these Chapter 11 Cases and on appeal (and utilize in these Chapter 11 Cases and on appeal) the proofs of claim and contracts that are being identified pursuant to this stipulation (but not included in the confirmation hearing exhibit binders).
6. The Order (Re: Related Party Stay) entered on December 30, 2019 and as amended on August 7, 2020 by the Ontario Superior Court of Justice ("Canadian Stay Order") is submitted as an exhibit for the Confirmation Hearing. The parties stipulate and agree that the Canadian Stay Order is submitted without objection, including as to foundation or relevance, for the facts of its entry and contents and not for the truth of any matters asserted therein.
7. These stipulations are not intended to limit or impact the rights of the parties with respect to insurance or the contracts identified herein.
8. The DMPs and the Debtors reserve the right to supplement or amend this Stipulation and the appendices attached hereto at any time prior to the Hearing.

Dated: August 19, 2021
New York, New York

Respectfully submitted,

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